

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Kadan A. Harris

Write the full name of each plaintiff.

-against-

Apollo Global Management, Inc

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

19 CV 11544

(Include case number if one has been assigned)

Employment Discrimination
COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

RECEIVED
SDNY PMD-12 CIV 102
2019 DEC 13 PM 1:00

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

The Civil Rights Act of 1964

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, Apollo Global Management Inc., is incorporated under the laws of
the State of New York

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

<u>Kadar</u>	<u>A</u>	<u>Harris</u>
First Name	Middle Initial	Last Name
<u>250. West 77th St.</u>		
Street Address		
<u>New York</u>	<u>NY</u>	<u>10024</u>
County, City	State	Zip Code
<u>631-444-1356</u>	<u>kadarharris38@gmail.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Apollo Global Management Inc.
 First Name Last Name

 Current Job Title (or other identifying information)

9. West 57th St 43rd Floor
 Current Work Address (or other address where defendant may be served)

New York NY 10019
 County, City State Zip Code

Defendant 2:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 3:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Apollo Global Management, Inc 9 West 57th St NY, NY 10019

Place(s) of occurrence:

Apollo Global Management, Inc. 3 Bryant Park NY NY 10036

Date(s) of occurrence:

July 9th, 2019, August 19th & 20th, August 30th & July 16th, 2019

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I was employed as a contract employee at Apollo Global Management Inc in New York City at their 3 Bryant Park location from July 8th, 2019 to August 30th 2019. I was hired as a part of the Legal Billing team at Apollo and reported directly to the Legal Billing manager Brittany Maschi.

From my very first couple of days at Apollo Global Management I was subjected to unwanted remarks relative to my ethnicity/race made by Brittany Maschi. For example, on Tuesday July 9th, 2019 while sitting at my desk, I was approached by Brittany Maschi. Brittany inquired about how far along I had gotten with some reading material about the

history of the firm she asked me to read. In addition, Brittany went on to say that she thought I performed well during my first day with the firm. Brittany then went on to say and I quote "You're going to do well here. You don't give off a bad vibe." After that, she stated that the two consultants in the role prior to me were "very ghetto and lazy." I did not know at the time, but both of these consultants were black women. (Please see attached). →

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

The psychological and emotional affects of being treated unfairly because of my race and sex, being retaliated against for complaining about a co-worker are enormous. I have lost sleep, the stress associated with paying my bills without a ^{job} are unbearable. Because ^{someone} at Apollo Global Management told the consulting firm I work with that I was terminated because I had a problem with a co-worker, this has caused a reputational hazard for me, complicating the process of me working with that firm again.

IV. RELIEF State briefly what money damages or other relief you want the court to order.

Because of the damage to my reputation and because I was illegally dis-allowed from earning the \$15,296.64 I would have earned from Sept 2nd, 2019 to Dec 31st, 2019 I'd like the court to grant \$500,000.00 in compensatory damages. I would like the court to grant \$15,000,000.00 in punitive damages for the act of retaliating and discriminating against me. All violations of the Civil Rights Act of 1964.

The comment made regarding me not giving off a "hood vibe" was a direct reference to me being black. For context, it is widely known that the term "hood" is stereotypical term used to describe black people from urban backgrounds and who exhibit less than distinguished behavior.

I responded to Brittany's inappropriate comment by saying "I'm here to put my best foot forward and perform to the best of my ability." Brittany responded "that's good" asked me to let her know if I needed help with anything and walked away. It's worth noting that at the time of my employment I was the only black person on the legal billing team and the only male on the billing team. The other 3 women on the billing team were Brittany Maschi (Caucasian), Tricia Anderson (Caucasian), and Ilana Bravo (Latino).

With respects to Ilana Bravo the only other non-white member of the billing team at Apollo Global Management, Brittany Maschi made numerous inappropriate comments to me about this woman's job performance. Going as far as to tell me about confidential Human Capital matters concerning Ilano Bravo; such as Ilana Bravo receiving "write ups" for poor job performance. This is important because, not once did Brittany Maschi ever make to me unfavorable references about employees past or present who were white. However, every single unfavorable reference was about an employee of the firm who was either black or non-white. Ilana Bravo resigned from her full time position on the legal billing team about a month and a half into my employment. Subsequently, I was given Ilana's job responsibility of handling the Private Equity and Real Property invoices for the firm. Whereas, prior to her resignation I was handling Registered Agent invoices. So one could say I was promoted.

To further support my claim of racial bias/discrimination on the part of Brittany Maschi, I point to a conversation I had with Brittany on Tuesday July 16th, 2019, prior to attending a legal workshop hosted by Kannan Shammugam of the renowned law firm Paul Weiss. This workshop took place at Apollo Global

Management's global headquarters at 9 West 57th St in New York City.

During the conversation I had with Brittany Maschi and I don't know why she shared this, but without provocation Brittany divulged to me that she was previously accused of making racially insensitive comments in the form of a joke. Brittany's comments were a part of an office email chain. Her comments were noticed and reported to Human Capital by a long tenured receptionist of the firm, who is a black woman. After, telling me about this Brittany asked me not to mention it to anyone. During another visit that Brittany and I made to the firm's global headquarters we saw the receptionist that Brittany spoke of in the admission she made to me weeks earlier. After we left the firm, while walking up 57th St towards 6th Avenue, Brittany asked me "Did you see the black woman that walked by when we were upstairs?" I responded "yes". Brittany replied "that's the bitch I told you about." Brittany then said "I don't understand why the firm doesn't just pay her to retire."

All of these comments were unwanted. I would have preferred that Brittany never made them; as they me very uncomfortable and projected the firm in a less than admirable light. Please know I would have no knowledge of any prior accusations of racial bias made against Ms. Maschi had she not told me about them. If true, I'm sure there will be a record of them in personnel file at the firm.

Regarding the retaliatory aspect of my complaint, I offer the following for review.

On August 19th and August 20th 2019 I received what I consider to be antagonistic Skype correspondence from Tricia Anderson, one of my white female counterparts I mentioned earlier in this complaint. These correspondence which I have and are Exhibit A, consisted of Tricia Anderson attempting to boss me around and stating the direct orders I received from the manager were "inefficient" and "not a good use of my time." By this point, the Legal Billing team at Apollo only consisted of myself, Tricia Anderson, and Brittany Maschi. To reiterate, Ilano Bravo had resigned by this time and subsequently I was given the task of taking on Ilana's responsibilities. Those responsibilities being the handling of all the Private Equity and

Real Property invoices for the entire firm. This was something I know Tricia Anderson took exception with. According to Brittany Maschi, Tricia Anderson asked to be given the responsibilities upon Ilana Bravo's departure and was told "no". I sure this was Tricia Anderson's motivation for sending me the antagonistic correspondence. As she was not happy about and felt threatened by the successes I was having within the department.

Upon receiving these antagonistic correspondence from Tricia Anderson, I on August 20th, 2019 sent Brittany Maschi a message via the mobile application Whatsapp. At this point, Brittany was out of the country on vacation and had been since Friday August 16th, 2019. In the Whatsapp messages I sent to Brittany which I have I expressed that I had received some workplace correspondence from Tricia that I deemed inappropriate and that indicated to me that Tricia was being territorial. In a Whatsapp message received from Brittany Maschi on August 20th, 2019 she stated that she would have to see the messages from Tricia "in context" and that it would be addressed when she returned from vacation. Brittany was scheduled to return to the office August 29th, 2019.

On August 26th 2019 I sent an inter-office email to both Tricia Anderson and Charles Kirk. The email stated that I would be out of the office on August 27th and August 28th, 2019 returning on August 29th, 2019. Neither Tricia Anderson or Charles Kirk responded to the email. For context Charles Kirk is a white male who is an Information Technology employee that works closely with the Legal Billing department at Apollo Global Management.

On August 29th, 2019 upon her return to the office Brittany Maschi and I sat down in her bosses office to discuss the Skype communications I received from Tricia Anderson. During the meeting Brittany Maschi's position was that she could totally understand why I took exception to Tricia Anderson's correspondence. Brittany stated that Tricia in the past, received not so good performance reviews because of her lack of ability to communicate within her role at the firm. My position during the meeting was that I wanted to move past it and that I had no problem working with Tricia, but that it was too early in my tenure at the firm for these sorts of issues to be arising and I

wanted to have them addressed. I referenced that fact that I had taken the last two days off to tend to a personal matter and that the email I'd sent to my colleagues was not responded to. I was given no indication from Brittany Maschi during our meeting that my taking the 2 days off was viewed as a negative. I left the meeting feeling like we had moved past the issue and all was well.

The following day August 30th, 2019, I came to work like I normally had. I concluded my day at 2:30pm as it was the Labor Day Holiday weekend. Shortly after leaving the office I received a call from the consulting firm Michael Page which helped me to attain the opportunity at Apollo Global Management. During the call the account manager who worked to get me the interview with Apollo made me aware that my assignment at Apollo Global Management was over effective immediately. The reason I given for my termination was that I had taken 2 days off from work; those being the days I referenced earlier in my complaint August 27th and August 28th 2019.

Let me say this, under no circumstances is it legitimate that an employee/contractor be fired from their employment for taking 2 days off from work after giving prior notice. There were no extenuating circumstances relative to my work such as poor job performance, not following direct orders, or tardiness. I have zero doubt that the sole reasoning behind my termination was my complaining about an employee who Brittany Maschi shared a common bond with as a white woman and whom Brittany Maschi is friendly with. This is retaliation. Additionally, my employment/contract at Apollo Global Management was scheduled to continue for the remainder of 2019.

I was such an exemplary employee while at Apollo Global Management that I was personally given Brittany Maschi's company corporate card for travel between the Apollo's New York City and Purchase New York offices. A trip that I made at least once. I was also scheduled to be nominated for full-time employment with the firm by Brittany Maschi once her superior and Chief Operating Officer at Apollo Kristen McMahon returned from maternity leave.

Given the circumstances there was no legitimate reason for me to be fired. This is an example of Brittany Maschi deciding to

end my employment because I forgot my place. Which in her eyes was just to shut up, do the job, and not complain. It is my contention that if I wasn't black a male working in the department with 2 whites females (1 of which did not like me) and in an office environment that was during the time of my employment pro dominantly non-black, my termination would not have occurred. Additionally, and regarding my accusation of retaliation, I called the New York City offices of Michael Page on November 14th, 2019. I called the direct line of a recruiter who I worked with at Michael Page on other employment opportunities over the past couple of years. The purpose of the call was to work with this recruiter again on obtaining a new employment opportunity. At the beginning of the call I made this recruiter aware of the fact that up until Sep 30th, 2019 I'd worked at Apollo Global Management; and that my contract there came to an un amicable fashion.

The recruiter told me she was aware of the situation because works closely with the team that helped me to get the contract at Apollo. The recruiter then went on to say that her understanding was that my contract was ended because I had a problem with a full time employee. This is a far cry from what I was told over two months ago at the time of my termination by the account manger at Michael Page. It's my contention that Michael Page was aware at that time that Apollo's that actions regarding the termination of my contract were not correct and attempted to hide it from me. Aside from this revelation lending itself to my accusation of retaliation it has also created a reputational hazard for me. This reputational hazard has damaged my relationship with Michael Page beyond repair as I doubt that they will be willing to assist in future career searches as a result of being told I had a problem with another employee. I can understand why Apollo Global Management wouldn't come out and say "Kadar Harris's contract was cancelled because he complained to his Superior about unwanted instant messages."as this would constitute an illegal employment act. However falsely stating that I had a problem or confrontation with a full time employee is equally as egregious and has done irreplaceable damage to my reputation, and my ability to mitigate my losses to this point. Prior to my employment at Apollo Global Management I was contracted through Michael Page on at least 5 different occasions and never once was a contract of mine terminated for any reason by any of the employers or organizations I worked

with.

Also, I'd like it to be known that at the time of my termination the Legal Billing team consisted only of myself, Brittany Maschi, and the employee I complained about Tricia Anderson. At this time there were a significant amount of legal invoices being submitted to the department; and I mean in the hundreds daily. Most of the invoices were practice invoices that were submitted by the various law firms.

So if it wasn't retaliation, I don't understand how you terminate an employee/contractor (in this case me) who was adding value, hadn't caused any fights or arguments, and did all that they were asked to do when there would only be 2 employees left in the entire department to action this substantial amount of work.

If it would please the court, please know that prior to filing this legal notification on October 8th, 2019 I sent via certified mail a demand letter to the Chief Legal Officer at Apollo Global Management Inc John Suydam as well as one to the General Counsel at Apollo Global Management Inc Chris Weideman. In the letters I asked to receive a response to my demand one way or the other within 30 days time. However, to this point I have yet to receive a response. I also asked in the demand letters that all documents be preserved relative to my instant message and email communications with the employees mentioned in this complaint as well as other full time employees of the firm I corresponded with.

I look forward to my day in court, so that this matter may be weighed by a jury of my peers.

Thank you

Kadar A Harris

EXHIBIT A

Correspondence Between Ms. Tricia Anderson
Which Prompted Me To Complain To My Superior, For
Which I Was Subsequently Terminated.

[8/19/2019 11:05 AM] Tricia Anderson:

ye same use the Hercules CDPQ

NOT the plain hercules

[8/19/2019 11:09 AM] Tricia Anderson:

have you just been working on that code this morning? How far along are you? Just dont want you to be wasting time on that since im going to be reviewing it anyways i can take over if you want

[8/19/2019 11:14 AM] LADAR HARRIS

I've been working on everything from coding to rejections to maters in review. But regarding the codes for this particular assignment- be my guest. I will send you over the spreadsheet with the codes that have already been captured.

[8/19/2019 11:15 AM] Tricia Anderson:

please do

im not sure why Brittany asked you to do that!

its not a good use of your time at this point lol

[8/19/2019 11:17 AM]

It was fine. Having said that, some of the codes aren't showing in EAS or the reference guide. It's amazing the body of work our dear friend IB left us. (headbang)

[8/19/2019 11:17 AM] Tricia Anderson:

FYI when coding these in the future you arent going to be using dept codes unless a fund is liquidated or otherwise specified

im seeing you pulled a lot of dept codes

[8/19/2019 11:18 AM]

I agree and thank you. Thing is those were the only codes I could find bearing the names in the spread sheets. I'm sure a few were just me. But I'm definitely aware we want to be using the fund codes.

[8/19/2019 11:19 AM] Tricia Anderson:

just an as FYI be sensitive of using dept codes on ANY invoices unless specified as these become Firm costs and its better to have the funds pay when possible

ok coo

I

not sure if brittnay ever mentioend that

[8/19/2019 11:19 AM]

(y) Yes- we definitely went over that.

[8/19/2019 11:20 AM] Tricia Anderson:

ok goof

good

[8/19/2019 11:21 AM] Tricia Anderson:

also - thought about it over the weekend and please do not take anythign im say to you as an offense. there is so much to go over and as i think of random tidbits i know it seems i may be barking them at you but its just me rattling off my thoughts so hope its not coming across as bossy!

esp over email and skype i realized i cant have the same delivery as real life lo

dont want to scare you!

[8/19/2019 11:23 AM]

Never thought about it. But I appreciate the mention. I've learned through years now of corporate experience not to take anything personal. It's how I've survived this long HAHAAHA

[8/19/2019 11:24 AM] Tricia Anderson:

ok lol it dawned on me over the weekend and didnt want to come off in such a way

[8/19/2019 11:25 AM] Tricia Anderson:

i also know what is a good use of time and not so good as such a new person so i may swoop in on some things and give you others to do - i think brittany is more of the mind to throw you into things as a learning experience but i dont find that as effiecient!

[8/19/2019 11:25 AM]

I really hadn't noticed. You're all good in my book. It's a pleasure working with you.

[8/19/2019 11:25 AM] Tricia Anderson:

ok good to hear (chuckle)

it will all come in time

[8/19/2019 11:28 AM]

And would even that she's see my ability to get things done. So I can understand from her perspective why she feels the hit ground running learning curve is a good approach. To this point I haven't been overwhelmed by anything. I also think the systems functionality as it relates to certain task plays a part. I'm sure the new system will change that for the better.

[8/19/2019 11:31 AM] Tricia Anderson:

good. dont get me wrong, i know you are capable and constantly learning. but also must be realistic and keep you going at a steady pace to familiarize with certain things before having you do others. also trying to avoid us both doing the same thing overlapping bc as you can see there is no shortage of other things to delegate!

[8/19/2019 11:32 AM]

FYI I'm leaving the office today at 5:30. I have a function to attend which I totally forgot about. Just a heads up.

[8/19/2019 11:32 AM] Tricia Anderson:

sure NP

[8/19/2019 11:34 AM] Tricia Anderson:

i remeber how IB made me feel my first several months here and now with her gone, i dont want to make someone else feel that way!

it wasnt fun lol

IB = ilana

still used to speaking in code, forget i dont need to anymore haha

[8/19/2019 11:35 AM] KADAR HARRIS

You're a better person than me. I would have complained immediately(talktothehand)

[8/19/2019 12:05 PM] Tricia Anderson:

FYI i just looked and we do not have matters open

[8/19/2019 12:05 PM]

Okay

[8/19/2019 12:07 PM] Tricia Anderson:

im going to grab lunch - will open those matters for the firm and reply with the IDs - they SHOULD request online but that firm usually doesnt and prob has no clue. Easier to just do it for them

[8/19/2019 12:07 PM]

Got it.

[8/19/2019 12:09 PM]

Practice group invoices do not get discounts correct ?

[8/19/2019 12:09 PM] Tricia Anderson:

Regarding my email for the Houthoff invoices - go ahead and check all those off as DO NOT PAY but leave in review. I want to attach the PDFs they send before moving to approval
corretc

[8/19/2019 12:11 PM]

I'm not following. How do I leave them in review after refusing them as "not for payment by Apollo" ?

[8/19/2019 12:11 PM] Tricia Anderson:

not refusing

checkjng the DO NOTPAY box

on the invoice

they are goign to stay in LSS but go through for tracking purposes only

did brittany show yo that?

[8/19/2019 12:12 PM]

I got you. First time I've been asked to do that. Okay-I'll do that.

And that's for all of them correct ?

[8/19/2019 12:12 PM] Tricia Anderson:

all for that firm yes

[8/19/2019 12:12 PM]

Okay

[8/19/2019 12:13 PM] Tricia Anderson:

chris is prob sitll attorney on so,me as well - make sure you udapte to Jim or Agnesizka
but leave in review for now until we get the PDFs to attach

[8/19/2019 12:13 PM]

(y)

[8/19/2019 12:13 PM] Tricia Anderson:

thanks

br

n

BRB*

[8/19/2019 12:52 PM] Tricia Anderson:

FYI im on one of those online trainigns for new system from 1-5

cant believe its going to take tjhat long (better not) but ill be working during it as well

[8/19/2019 1:04 PM]

Enjoy !

[8/19/2019 1:05 PM] Tricia Anderson:

oh joy

[8/19/2019 1:09 PM] Tricia Anderson:

can you lok into those CSC invoices from brittanys email?

[8/19/2019 1:11 PM]

Yes- I'll check for them.

[8/19/2019 1:35 PM] Tricia Anderson:

that attachment looks fine to me!

[8/19/2019 1:36 PM]

It didn't come through on my end for some reason. Murat just sent it to me. So all is well.

[8/19/2019 1:37 PM] Tricia Anderson:

k

[8/19/2019 1:39 PM]

Having said that I'm seeing the initial email from Murat which has the attachment. The email from Brittany has nothing attached to it- hence the confusion.

[8/19/2019 1:42 PM] Tricia Anderson:

gotcha

[8/19/2019 1:49 PM] Tricia Anderson:

if you dont see any of those tell Murat to instrict CSC to submt them

[8/19/2019 1:51 PM]

Yeah they're not there. I will INSTRUCT him to do that. Thanks.

[8/19/2019 1:52 PM] Tricia Anderson:

(handshake)

[8/19/2019 4:20 PM]

FYI all of those Houthoff invoices have been marked #doNotPay and updated accordingly.

[8/19/2019 4:22 PM] Tricia Anderson:

thanks

once we get thej PDFs ill give you the next steps

[8/19/2019 4:22 PM]

np

[8/19/2019 4:22 PM] Tricia Anderson:

totally up to you if you want to move those into allocation to free up your review tab, feel free
i moved mine into allocoation just bc they were bothering me in review

[8/19/2019 4:23 PM]

They're good. I'll do everything at once.

[8/19/2019 4:26 PM] Tricia Anderson:

ok. and i guess n oothe rmatter needed for that baker firm.
no other*

[8/19/2019 4:27 PM]

I surmised as much. So in other words they can just bill for both to 51995

[8/19/2019 4:31 PM] Tricia Anderson:

yes

[8/19/2019 4:31 PM]

Mission Accomplished

[8/19/2019 4:32 PM] Tricia Anderson:

(rock)

[8/19/2019 4:33 PM]

:)

[8/19/2019 4:36 PM]

What's the indicator for the practice invoices again ?

[8/19/2019 4:37 PM] Tricia Anderson:

it will say in the summary notes section "APG ..."

[8/19/2019 4:37 PM]

Thank you

[8/19/2019 5:17 PM]

I'm rolling out in 14 minutes. Are you here tomorrow ?

[8/19/2019 5:18 PM] Tricia Anderson:

ok

no ill be in wed

purchase rst of week

[8/19/2019 5:20 PM]

Ok. Talk tomorrow. I just responded to you email. I'll take care of that in the morning.

[8/19/2019 5:21 PM] Tricia Anderson:

ok i replied back

NP

[8/20/2019 9:04 AM] Tricia Anderson:

gotta be careful with emails like that with the firms on them
thats an invoice they were going to write off but you indicated it was approved
i will respond

[8/20/2019 9:05 AM] Tricia Anderson:

if you have a quetion like that leave the firm off

[8/20/2019 9:06 AM]

I said it was in approval. Which it is correct ?

[8/20/2019 9:07 AM] Tricia Anderson:

wasnt necessary to say that. we can always pull an invoice out of approval, the firm doesnt need to know that
you just refuse it back

[8/20/2019 9:09 AM] KADAR HARNIS

Either you or Brittany will have to show me how to do that. Pretty sure I haven't pulled an invoice already "In Approval" out of approval.

[8/20/2019 9:10 AM] Tricia Anderson:

its super simple ill show you later today

[8/20/2019 9:10 AM]

yeah yeah

[8/20/2019 9:10 AM] Tricia Anderson:

just in general you have to be short with the firms and not loop them in on internal questions becuase they will either
get confused or change their minds

[8/20/2019 9:12 AM] KADAR HARNIS

Cool.

[8/20/2019 9:12 AM] Tricia Anderson:

→ continued next page

see now they want to keep it in payment
not cool!
let me handle

[8/20/2019 9:14 AM] KADAR HARRIS

The email was addressed to me which is why I responded to it. If a make mistake was made I can take ownership of that. However I'm going to be proactive when an email is addressed to me. I appreciate very much you sharing and I get you point. Thanks

[8/20/2019 9:16 AM] Tricia Anderson:

thats fine but you just need to be more careful on email. Too much extra back and forth is not efficient
it will cause issue

s

[8/20/2019 9:17 AM]

So I'm forwarding you over a new matter request from Tecora. You will see it in seconds. Unless you want to show me how to do it.

[8/20/2019 9:18 AM] Tricia Anderson:

example you thanked him for saying not you refuse it as i responded that we are following original instruction
ok

[8/20/2019 9:18 AM]

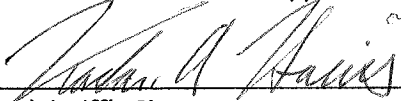
Sending now.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated _____		Plaintiff's Signature 	
First Name <u>Kadar</u>	Middle Initial <u>A</u>	Last Name <u>Harris</u>	
Street Address <u>250. West 77th. St Apt 603</u>			
County, City <u>New York</u>	State <u>NY</u>	Zip Code <u>10024</u>	
Telephone Number <u>631-944-1356</u>	Email Address (if available) <u>Kadarharris38@gmail.com</u>		

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: **Kadar A. Harris**
250 West 77th Street, Apt 603
New York, NY 10024

From: **New York District Office**
33 Whitehall Street
5th Floor
New York, NY 10004

☐

On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2019-05980

Orfelino Genao,
Investigator

(212) 336-3642

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☐

More than 180 days have passed since the filing of this charge.

☒

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

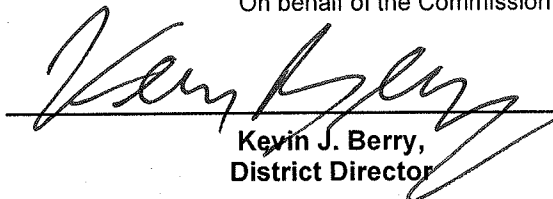
☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission


Kevin J. Berry,
District Director

9-23-2019

(Date Mailed)

Enclosures(s)

cc:

APOLLO GLOBAL MANAGEMENT
9 West 57th St 43rd Floor
New York, NY 10019

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10 – not 12/1/10** -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

**FACTS ABOUT FILING
AN EMPLOYMENT DISCRIMINATION SUIT
IN FEDERAL COURT IN NEW YORK STATE**

You have received a document which is the final determination or other final action of the Commission. This ends our handling of your charge. The Commission's action is effective upon receipt. Now, you must decide whether you want to file a private lawsuit in court. This fact sheet answers several commonly asked questions about filing a private lawsuit.

WHERE SHOULD I FILE MY LAWSUIT?

Federal District Courts have strict rules concerning where you may file a suit. You may file a lawsuit against the respondent (employer, union, or employment agency) named in your charge. The appropriate court is the district court which covers either the county where the respondent is located or the county where the alleged act of discrimination occurred. However, you should contact the court directly if you have questions where to file your lawsuit. New York State has four federal districts:

- The United States District Court for the Southern District of New York is located at 500 Pearl Street in Manhattan. It covers the counties of Bronx, Dutchess, New York (Manhattan), Orange, Putnam, Rockland, Sullivan, and Westchester. (212) 805-0136 <http://www.nysd.uscourts.gov>
- The United States District Court for the Eastern District of New York is located at 225 Cadman Plaza in Brooklyn and covers the counties of Kings (Brooklyn), Nassau, Queens, Richmond (Staten Island), and Suffolk. (718) 613-2600 <http://www.nyed.uscourts.gov>
- The United States District Court for the Western District of New York is located at 68 Court Street in Buffalo. It covers the counties of Allegheny, Cattaraugus, Chautauqua, Chemung, Erie, Genesee, Livingston, Monroe, Niagara, Ontario, Orleans, Schuyler, Seneca, Steuben, Wayne, Wyoming, and Yates. (716) 551-4211 <http://www.nywd.uscourts.gov>
- The United States District Court for the Northern District of New York is located at 100 South Clinton Street in Syracuse and covers the counties of Albany, Broome, Cayuga, Chanango, Clinton, Columbia, Cortland, Delaware, Essex, Franklin, Fulton, Greene, Hamilton, Herkimer, Jefferson, Lewis, Madison, Montgomery, Oneida, Onandaga, Oswego, Otsego, Rensselaer, St. Lawrence, Saratoga, Schenectady, Schoharie, Tioga, Tompkins, Ulster, Warren, and Washington. This District Court's pro Se Attorney has offices at 10 Broad Street in Utica New York. (315) 234-8500 <http://www.nynd.uscourts.gov>

WHEN MUST I FILE MY LAWSUIT?

Your private lawsuit must be filed in U.S. District Court within 90 days of the date you receive the enclosed EEOC Notice of Right to Sue. Otherwise, you will have lost your right to sue.

(Over)